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Before the FEDERAL COMMUNICATIONS COMMISSION Washington, D.C. 20554

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In the Matter of	PEDERAL COMMUNICATIONS COMMISSION OFFICE OF THE SECRETARY
)
Truth-in-Billing) CC Docket No. 98-170
and)
Billing Format)

Petition for Temporary, Limited Waiver

The Petitioning Local Exchange Companies referenced in Attachment A hereto (the "Petitioners" or, individually, "Petitioner"), by counsel, hereby seek temporary, limited waiver of the Truth-in-Billing ("TIB") requirements, set forth in 47 C.F.R. § 64.2400, established by the Federal Communications Commission ("Commission" or "FCC") in its First Report and Order and Further Notice of Proposed Rulemaking, released May 11, 1999 in the above-captioned matter. Specifically, the Petitioners seek temporary waiver of Section 64.2401(d) regarding disclosure of inquiry contacts (the "TIB Inquiry Contact Rule") until April 1, 2000.

Telephone bills must contain clear and conspicuous disclosure of any information that the customer may need to make inquiries about, or contest charges, on the bill. Common carriers must prominently display on each bill a toll-free number or numbers by which customers may inquire or dispute any charge contained on the bill. A carrier may list a toll-free number for a billing agent, clearinghouse, or other third party, provided that such party possesses sufficient information to answer questions concerning the customer's

(Footnote Continued on Next Page)

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¹ Attachment A contains the declarations of each of the Petitioners. Some of the declarations contain facsimile signatures. The original signed declarations will be filed with the Commission upon receipt by counsel.

In the Matter of Truth-in-Billing and Billing Format, First Report and Order and Further Notice of Proposed Rulemaking, CC Docket No. 98-170, FCC 99-72, released May 11, 1999, 64 Fed. Reg. 34488 (June 25, 1999); Errata, CC Docket No. 98-170, DA 99-2092, released October 6, 1999.

³ 47 C.F.R. § 64.2401(d) states that

The Petitioners recognize that a pending Petition filed by the United States Telecom Association ("USTA") seeks similar relief for USTA member companies. However, as indicated in the Attachment, not all of the Petitioners are USTA members. Accordingly, in the event that action on the USTA Petition does not grant the extent of the relief requested herein, the Petitioners request a waiver of 47 C.F.R. § 64.2401(d) until April 1, 2000, the date that the Commission has previously established for implementing certain other TIB requirements. Until the waiver requested expires, each Petitioner will continue to provide its contact number for customers with questions concerning charges of particular carriers, and will facilitate the customer's effort to contact such carriers.

I. Good Cause Exists for this Limited Waiver

The practical problems and limitations confronting the Petitioners associated with implementing the TIB Inquiry Contact Rule directives make compliance by November 12, 1999 infeasible. Accordingly, for the reasons stated below, good cause exists for this waiver.⁴

⁽Footnote Continued from Previous Page)

account and is fully authorized to resolve consumer complaints on the carrier's behalf. Each carrier must make its business address available upon request to consumers through its toll-free number.

The Commission may exercise its discretion to waive a rule where particular facts would make strict compliance inconsistent with the public interest." WAIT Radio v. FCC, 418 F.2d 1153, 1159 (D.C. Cir. 1969). Waiver of a Commission rule is appropriate where (1) the underlying purpose of the rule will not be served, or would be frustrated, by its application in a particular case, and grant of the waiver is otherwise in the public interest, or (2) unique facts or circumstances render application of the rule inequitable, unduly burdensome or otherwise contrary to the public interest, and there is no reasonable alternative. Northeast Cellular Telephone Co., L.P. v. FCC, 897 F.2d 1164, 1166 (D.C. Cir. 1990).

The need for this limited waiver arises in connection with the Petitioner's billing for casual calling and alternative service providers (collectively referred to as "AOS providers"), i.e., carriers other than the presubscribed "1+" carrier of the customer. The Petitioners each receive data from the AOS provider's clearinghouse, which, in turn, are typically aggregated in one section of a Petitioner's bill. This bill section may identify one or, at times, several different AOS providers based on the customer's decision to make a casual call or to use an alternative service provider in a given billing cycle. As a result, the software must accommodate varying levels of demand required to conduct necessary screening and identification of an AOS provider; these demands will, in turn, affect the processing time associated with rendering the bill.

Although each of the Petitioners has contacted its billing vendor to make the necessary software and bill processing changes, it now appears that it will be technically infeasible for each of the Petitioners to comply with the November 12, 1999 date by which 47 C.F.R. § 64.2401(d) is scheduled to go into effect.⁵ Moreover, certain of the Petitioners have been informed by their AOS clearinghouse that the necessary inquiry contact information may not be available for all AOS providers by the November 12, 1999 date.⁶ The Commission's November 12, 1999 implementation date is further complicated by efforts to address Year 2000 issues.⁷

⁵ <u>See</u> 64 Fed. Reg. 55163 (Oct. 12, 1999); <u>see also Public Notice</u>, DA 99-2030 (Sept. 30, 1999) and Public Notice, DA 99-1789 (Sept. 2, 1999).

Although the Petitioners typically have the authority to issue credits to customers for AOS charges, the AOS providers may, independently, seek payment of those charges from customers. Accordingly, the Petitioners are not "fully authorized to resolve consumer complaints on the carrier's behalf." 47 C.F.R. § 64.2401(d).

Accord USTA Petition at 4, 9, and 11.

Nevertheless, each of the Petitioners will continue to work with its software vendor and the affected clearinghouse in order to implement the requirements of 47 C.F.R. § 64.2401(d) as soon as practical. Consistent with the implementation of other TIB-required billing software changes, the Petitioners submit that compliance with the TIB Inquiry Contact Rule should be possible by April 1, 2000.

II. The Public Interest will be Served by a Grant of this Limited Waiver

The Petitioners respectfully submit that the public interest would be served by this action. First, the Commission has recognized the need to balance the implementation of new regulatory directives which affect computerized systems with on-going Year 2000 activities. The software changes required of the Petitioners' respective billing systems clearly fall into this Commission-defined category. The Commission's concerns regarding utilization of its Year 2000 Policy Statement to "'forestall' or 'roll back' disfavored regulations, or use this policy for purposes of competitive advantage" are not applicable here. The Petitioners are working toward TIB Rule compliance and seek only a limited extension of time consistent with the Commission-prescribed compliance date of certain other TIB Rules. Accordingly, there is no basis to conclude that the Petitioners are attempting to forestall or roll back disfavored regulations. Moreover, there is no competitive advantage associated with this request. A grant of this waiver does not affect a competitor of the Petitioners; rather it allows an interim measure to be implemented that allows

⁸ See In the Matter of Minimizing Regulatory and Information Technology Requirements That Could Adversely Affect Progress Fixing the Year 2000 Date Conversion Problem, Year 2000 Network Stabilization Policy Statement, FCC 99-272, released October 4, 1999 ("Year 2000 Policy Statement") at para. 15.

⁹ <u>Id</u>. at para. 16.

continuation of existing billing arrangements with other carriers in a manner consistent with the status of overall TIB compliance efforts by the Petitioners.

Second, the Commission has already determined that the April 1, 2000 date is appropriate for implementing other TIB requirements. Accordingly, the ability of the Petitioners to continue to work toward the April 1, 2000 implementation date for all TIB rules would ensure efficiency and continuity in the development of the Petitioners' billing system capability without incurring unnecessary expenditures or jeopardizing Year 2000 compliance issues.

Third, the underlying goal of the TIB Inquiry Contact Rule -- ability of a customer to inquire about a charge -- would not be frustrated by a grant of the requested waiver. As is done today, until the requested waiver expires the Petitioners will provide their local telephone number on the bill in order to allow customers to contact them about AOS provider charges. When a customer makes such an inquiry, the Petitioner will, at the customer's option, provide the AOS provider's toll free number or will seek to establish a three-way conference call with the AOS provider (or its billing clearinghouse) in order that the customer may address his/her concern about a charge. In this way, the goal of the TIB Inquiry Contact Rule would be advanced. Waiver of the TIB Rules as requested herein will merely maintain the status quo until such time as all of the TIB Rules can be implemented efficiently and consistently by each Petitioner, while effecting the goals of the TIB Rules.

Finally, the Petitioners note that, in the absence of this limited waiver, the ability of the Petitioners to bill for isolated customer-originated traffic on behalf of AOS providers would be in jeopardy. Facing the risk of non-compliance with the TIB Inquiry Contact Rule, the

¹⁰ <u>See</u> n. 5, <u>supra</u>.

Petitioners may be forced to consider terminating their billing relationship with the AOS providers. This, in turn, may increase the cost to the AOS provider of billing, thereby inhibiting the continued development of a competitive interexchange service marketplace.

Conclusion III.

Because the Petitioners are technically incapable of complying with the TIB "Inquiry Contact" Rules by November 12, 1999, a grant of this request until April 1, 2000 will ensure that the Petitioners can implement the directives from the Commission with respect to TIB in an efficient manner while avoiding unnecessary expense or raising additional Year 2000 compliance issues. At the same time, the consumer goals of the TIB Inquiry Contact Rule will not be frustrated by a grant of this request. Rather, such goals will be furthered by each Independent continuing to provide customer assistance and responsiveness when questions are received regarding the charges for services or the identity of service providers.

Accordingly, in the event that action on the USTA Petition does not grant the extent of the relief requested herein, the Petitioners request a waiver of the requirements of 47 C.F.R. § 64.2401(d) until April 1, 2000.

Respectfully submitted,

The Petitioning Local Exchange Companies

By

David Cosson

Thomas J. Moorman

Margaret Nyland

Kraskin, Lesse & Cosson, LLP 2120 L Street, NW, Suite 520 Washington, DC 20037 202-296-8890

Their Attorneys

October 27, 1999

Attachment

Alenco Communications, Inc.

Armstrong Telephone Company - Maryland

Armstrong Telephone Company - Northern Division

Armstrong Telephone Company - New York

Armstrong Telephone Company - Pennsylvania

Armstrong Telephone Company - West Virginia

Armstrong Telephone Company - North

Blossom Telephone Company

Brazos Telecommunications, Inc.

Brazos Telephone Cooperative, Inc.

Champlain Telephone Company

Daviess-Martin County Rural Telephone Corporation

Dekalb Telephone Cooperative d/b/a DTC Communications

Eastex Telephone Cooperative, Inc.

Five Area Telephone Cooperative

Georgetown Telephone Company

Germantown Telephone Co.

Home Telephone Company

Livingston Telephone Company

Muenster Telephone Corporation of Texas

New Paris Telephone, Inc.

Nortex Telcom, L.L.C.

North Pittsburgh Telephone Company

Riviera Telephone Company

Santa Rosa Telephone Cooperative, Inc.

South Central Rural Telephone Cooperative, Inc.

South Plains Telephone Cooperative

Southwest Arkansas Telephone Coop., Inc.

West Kentucky Rural Telephone Cooperative

West Plains Telecommunications, Inc.

West Point Telephone Company, Inc.

West Texas Telephone Cooperative, Inc.

XIT Rural Telephone Cooperative, Inc.

XIT Telecommunications & Technology, Inc.

ALENCO COMMUNICATIONS, INC.

Alenco Communications, Inc. (the "Company") provides exchange and exchange access services to approximately 1,718 lines in Texas. The Company is a member of the United States Telephone Association ("USTA") and is a rural telephone company under the Communications Act of 1934 as amended. The Company utilizes UDP for the provision of billing software and uses INS and Illuminet as its clearinghouses for casual calling and alternate service provider billing and collection arrangements. The Company contacted its billing vendor with respect to the FCC's Truth-in-Billing ("TIB") requirements in September. 1999. Since that time, the Company has had discussions with its billing vendor regarding TIB Rule compliance. Because of backlog and/or programming demands (including those arising from Year 2000 issues), the vendor has indicated that it is not capable of providing the necessary software updates required to comply with inquiry contact requirements at this time. TIB implementation is further complicated by the fact that the Company currently provides billing and collection services for casual calling and alternate service providers. The Company is not yet capable of listing inquiry contacts on bills for these providers. Accordingly, the Company requests that this requirement be extended to April 1, 2000, the date that certain other TIB rule requirements are to be effective. The Company will. however, engage in proper testing and will continue to work with its clearinghouses and software vendor to coordinate the resolution of this issue. Until the requested waiver expires, the Company will continue to provide its contact number to customers with questions concerning charges of particular carriers, and will facilitate the customer's effort to contact such carriers.

DECLARATION OF KIRK PETTY

I, Kirk Petry, General Manager of Alenco Communications, Inc. ("Alenco"), do hereby declare under penalties of perjury that I have read the foregoing "Petition for Temporary, Limited Waiver" and the information contained therein regarding Alenco is true and accurate to the best of my knowledge, information, and belief.

Date: 10-27-99

By:

General Manager

ARMSTRONG TELEPHONE COMPANY - MARYLAND ARMSTRONG TELEPHONE COMPANY - NORTHERN DIVISION ARMSTRONG TELEPHONE COMPANY - NEW YORK ARMSTRONG TELEPHONE COMPANY - PENNSYLVANIA ARMSTRONG TELEPHONE COMPANY - WEST VIRGINIA ARMSTRONG TELEPHONE COMPANY - NORTH

Armstrong Telephone Company - Maryland, Armstrong Telephone Company -Northern Division, Armstrong Telephone Company - New York, Armstrong Telephone Company - Pennsylvania, Armstrong Telephone Company - West Virginia, and Armstrong Telephone Company - North (together, the "Companies") provide exchange and exchange access services in Maryland, New York, Pennsylvania and West Virginia. Specifically, Armstrong Telephone Company - Maryland provides service to approximately 7,000 access lines in Maryland. Armstrong Telephone Company - Northern Division provides service to approximately 4,500 access lines in West Virginia. Armstrong Telephone Company - New York provides service to approximately 3,500 access lines in New York. Armstrong Telephone Company - Pennsylvania provide service to approximately 1,700 access lines in Pennsylvania. Armstrong Telephone Company - West Virginia provides service to approximately 2,900 access lines in West Virginia. Armstrong Telephone Company - North provides service to approximately 500 access lines in Pennsylvania. The Companies are members of the United States Telephone Association ("USTA") and are rural telephone companies under the Communications Act of 1934 as amended. The Companies utilize APTIS for the provision of billing software and uses Independent NECA Services and Illuminet as its clearinghouses for casual calling and alternate service provider billing and collection arrangements. The Companies contacted its billing vendor with respect to the FCC's Truth-in-Billing ("TIB") requirements in May, 1999. Since that time, the Companies have had discussions with its billing vendor regarding TIB Rule compliance. Because of backlog and/or programming demands (including those arising from Year 2000 issues), the vendor has indicated that it is not capable of providing the necessary software updates required to comply with inquiry contact requirements at this time. TIB implementation is further complicated by the fact that the Companies currently provide billing and collection services for casual calling and alternate service providers. The Companies are not yet capable of listing inquiry contacts on bills for these providers. Accordingly, the Companies request that this requirement be extended to April 1, 2000, the date that certain other TIB rule requirements are to be effective. The Companies will, however, engage in proper testing and will continue to work with their clearinghouse and software vendor to coordinate the resolution of this issue. Until the requested waiver expires, the Companies will continue to provide their contact number to customers with questions concerning charges of particular carriers, and will facilitate the customer's effort to contact such carriers.

DECLARATION OF BARBARA J. DIRENZO

I, Barbara J. Direnzo, Controller of Armstrong Telephone Company - Maryland, Armstrong Telephone Company - Northern Division, Armstrong Telephone Company - New York, Armstrong Telephone Company - Pennsylvania, Armstrong Telephone Company - West Virginia, and Armstrong Telephone Company - North (the "Armstrong Companies"), do hereby declare under penalties of perjury that I have read the foregoing "Petition for Temporary, Limited Waiver" and the information contained therein regarding the Armstrong Companies is true and accurate to the best of my knowledge, information, and belief.

Date 10/22/99

Barbara J. Direnzo

Controller

BLOSSOM TELEPHONE COMPANY

Blossom Telephone Company (the "Company") provides exchange and exchange access services to approximately 1,388 lines in Texas. The Company is a member of the United States Telephone Association ("USTA") and is a rural telephone company under the Communications Act of 1934 as amended. The Company utilizes UDP for the provision of billing software and uses National Independent Billing as its clearinghouse for casual calling and alternate service provider billing and collection arrangements. The Company contacted its billing vendor with respect to the FCC's Truth-in-Billing ("TIB") requirements in September, 1999. Since that time, the Company has had discussions with its billing vendor regarding TIB Rule compliance. Because of backlog and/or programming demands (including those arising from Year 2000 issues), the vendor has indicated that it is not capable of providing the necessary software updates required to comply with inquiry contact requirements at this time. TTB implementation is further complicated by the fact that the Company currently provides billing and collection services for casual calling and alternate service providers. The Company is not yet capable of listing inquiry contacts on bills for these providers. Accordingly, the Company reducts that this requirement be extended to April 1, 2000, the date that certain other TIB rule requirements are to be effective. The Company will, however, engage in proper testing and will continue to work with its clearinghouse and software vendor to coordinate the resolution of this issue. Until the requested waiver expires, the Company will continue to provide its contact number to customers with questions concerning charges of particular carriers, and will facilitate the customer's effort to contact such carriers.

DECLARATION OF C.M. DORRIES

I. C.M. Dories. General Manager of Blossom Telephone Company ("Blossom"), do hereby declare under penalties of perjury that I have read the foregoing "Petition for Temporary. Limited Waiver" and the information contained therein regarding Blossom is true and accurate to the best of my knowledge, information, and belief.

Date: 10-27-99

ly:

C.M. Dorries
General Manager

16-26-88 64:37PM FROM-KRASKIN, LESSE & COSSON

202-296-8893

T-085 P.02/03 F-801

BRAZOS TELECOMMUNICATIONS, INC.

Brazo Telecommunications, Inc. (the "Company") provides exchange and exchange access services to approximately 4,295 lines in Texas. The Company is a rural telephone company under the Communications Act of 1934 as amended. The Company utilizes UDP for the provision of billing software and uses INS as its clearinghouse for casual calling and alternate service provider billing and collection arrangements. The Company contacted its billing vendor with respect to the FCC's Truth-in-Billing ("TIB") requirements in June, 1999. Since that time, the Company has had discussions with its billing vendor regarding TIB Rule compliance. Because of backlog and/or programming demands (including those arising from Year 2000 issues), the vendor has indicated that it is not capable of providing the necessary software updates required to comply with inquiry contact requirements at this time. TIB implementation is further complicated by the fact that the Company currently provides billing and collection services for casual calling and alternate service providers. The Company is not yet capable of listing inquiry contacts on bills for these providers. Accordingly, the Company requests that this requirement be extended to April 1, 2000, the date that certain other TIB rule requirements are to be effective. The Company will, however, engage in proper testing and will continue to work with its clearinghouse and software vendor to coordinate the resolution of this issue. Until the requested waiver expires, the Company will continue to provide its contact number to customers with questions concerning charges of particular carriers, and will facilitate the customer's effort to contact such carriers.

DECLARATION OF TED SCOBEE

I, Ted Scobee, Assistant Manager of Brazos Telecommunications, Inc. ("Brazos"), do hereby declare under penalties of perjury that I have read the foregoing "Petition for Temporary, Limited Waiver" and the information contained therein regarding Brazos is true and accurate to the best of my knowledge, information, and belief.

Date: 10-26-99

By:

Ted Scobee

Assistant Manager

102-286-88A3

1-086 P.03/03 F-801

BRAZOS TELEPHONE COOPERATIVE, INC.

FROM-KRASKIN, LESSE & COSSON

Brazos Telephone Cooperative, Inc. (the "Company") provides exchange and exchange access services to approximately 1,231 lines in Texas. The Company is a rural relephone company under the Communications Act of 1934 as amended. The Company utilizes UDP for the provision of billing software and uses INS as its clearinghouse for casual calling and alternate service provider billing and collection arrangements. The Company contacted its billing vendor with respect to the FCC's Truth-in-Billing ("TIB") requirements in June, 1999. Since that time, the Company has had discussions with its billing vendor regarding TIB Rule compliance. Because of backlog and/or programming demands (including those arising from Year 2000 issues), the vendor has indicated that it is not capable of providing the necessary software updates required to comply with inquiry contact requirements at this time. TIB implementation is further complicated by the fact that the Company currently provides billing and collection services for casual calling and alternate service providers. The Company is not yet capable of listing inquiry contacts on bills for these providers. Accordingly, the Company requests that this requirement be extended to April 1, 2000, the date that certain other TIB rule requirements are to be effective. The Company will, however, engage in proper testing and will continue to work with its clearinghouse and software vendor to coordinate the resolution of this issue. Until the requested waiver expires, the Company will continue to provide its contact number to customers with questions concerning charges of particular carriers, and will facilitate the customer's effort to contact such carriers.

DECLARATION OF TED SCOBEE

I, Ted Scobee, Assistant Manager of Brazos Telephone Cooperative, Inc. ("Brazos"), do hereby declare under penalties of perjury that I have read the foregoing "Petition for Temporary, Limited Waiver" and the information contained therein regarding Brazos is true and accurate to the best of my knowledge, information, and belief.

Date: 10-26-99

7. — 7.

Assistant Manager

CHAMPLAIN TELEPHONE COMPANY

Champlain Telephone Company (the "Company") provides exchange and exchange access services to approximately 5,650 lines in New York. The Company is a member of the United States Telephone Association ("USTA") and is a rural telephone company under the Communications Act of 1934 as amended. The Company utilizes APTIS for the provision of billing software. The Company contacted its billing vendor with respect to the FCC's TIB requirements in May, 1999. Since that time, the Company has had discussions with its hilling vendor regarding TIB Rule compliance. Because of backlog and/or programming demands, the vendor has provided the Company with an anticipated first quarter 2000 delivery date for the format prototype, assuming no changes in the current TIB rules. At this time, the Company will engage in proper testing and will work with its vendor to resolve any problems that may arise. Although implementation costs cannot be quantified at this time, the Company anticipates that implementation may be further complicated by the fact that the Company currently provides billing and collection services on various casual calling plans. These billing and collection arrangements, in turn, may lead to a significant number of "new service providers" being identified on a customer's bill in any given month.

DECLARATION OF CHRISTOPHER RENO

I. Christopher Reno. Chief Financial Officer of Champlain Telephone Company ("Champlain"), do hereby declare under penalties of perjury that I have read the foregoing "Petition for Temporary, Limited Waiver" and the information contained therein regarding Champlain is true and accurate to the best of my knowledge/information, and belief.

Date Oct 26, 1959

Christopher Reno Chief Financial Officer

DAVIESS-MARTIN COUNTY RURAL TELEPHONE CORPORATION

Daviess-Martin County Rural Telephone Corporation (the "Company") provides exchange and exchange access services to approximately 3,600 lines in Indiana. The Company is a rural telephone company under the Communications Act of 1934 as amended. The Company utilizes Martin & Associates for the provision of billing software and uses Independent NECA Services as its clearinghouse for casual calling and alternate service provider billing and collection arrangements. The Company contacted its billing vendor with respect to the FCC's Truth-in-Billing ("TIB") requirements in May, 1999. Since that time, the Company has had discussions with its billing vendor regarding TIB Rule compliance. Because of backlog and/or programming demands (including those arising from Year 2000 issues), the vendor has indicated that it is not capable of providing the necessary software updates required to comply with inquiry contact requirements at this time. TIB implementation is further complicated by the fact that the Company currently provides billing and collection services for casual calling and alternate service providers. The Company is not yet capable of listing inquiry contacts on bills for these providers. Accordingly, the Company requests that this requirement be extended to April 1, 2000, the date that certain other TIB rule requirements are to be effective. The Company will, however, engage in proper testing and will continue to work with its clearinghouse and software vendor to coordinate the resolution of this issue. Until the requested waiver expires, the Company will continue to provide its contact number to customers with questions concerning charges of particular carriers, and will facilitate the customer's effort to contact such carriers.

DECLARATION OF KELLY C. DYER

l, Kelly C. Dyer, Executive Vice President and General Manager of Daviess-Martin County Rural Telephone Corporation ("Daviess-Martin"), do hereby declare under penalties of perjury that I have read the foregoing "Petition for Temporary, Limited Waiver" and the information contained therein regarding Daviess-Martin is true and accurate to the best of my knowledge, information, and belief.

Date 10/22/99

Kelly C. Dyer

Executive Vice President and General Manager

DEKALB TELEPHONE COOPERATIVE, INC. d/b/a DTC Communications

DeKalb Telephone Cooperative, Inc. d/b/a DTC Communications (the "Company") provides exchange and exchange access services to approximately 20,043 lines in Tennessee. The Company is a rural telephone copany under the Communications Act of 1934 as amended. The Company utilizes Global Programming Services for the provision of billing software and uses Independent NECA Services as its clearinghouse for casual calling and alternate service provider billing and collection arrangements. The Company contacted its billing vendor with respect to the FCC's Truthin-Billing ("TIB") requirements in May, 1999. Since that time, the Company has had discussions with its billing vendor regarding T1B Rule compliance. Because of backlog and/or programming demands (including those arising from Year 2000 issues), the vendor has indicated that it is not capable of providing the necessary software updates required to comply with inquiry contact requirements at this time. TIB implementation is further complicated by the fact that the Company currently provides billing and collection services for casual calling and alternate service providers. The Company is not yet capable of listing inquiry contacts on bills for these providers. Accordingly, the Company requests that this requirement be extended to April 1, 2000, the date that certain other TIB requirements are to be effective. The Company will, however, engage in proper testing and will continue to work with its clearinghouse and software vendor to coordinate the resolution of this issue. Until the requested waiver expires, the Company will continue to provide its contact number to customers with questions concerning charges of particular carriers, and will facilitate the customer's effort to contact such carriers.

DECLARATION OF WAYNE GASSAWAY

I, Wayne Gassaway, Manager of DeKalb Telephone Cooperative ("DeKalb"), do hereby declare under penalties of perjury that I have read the foregoing "Petition for Temporary, Limited Waiver" and the information contained therein regarding DeKalb is true and accurate to the best of my knowledge, information, and belief. Wayne Gassaway
Manage

Date 10-22-99

Manager

EASTEX TELEPHONE COOPERATIVE, INC.

Eastex Telephone Cooperative, Inc. (the "Company") provides exchange and exchange access services to approximately 29,791 lines in Texas. The Company is a member of the United States Telephone Association ("USTA") and is a rural telephone company under the Communications Act of 1934 as amended. The Company utilizes UDP for the provision of billing software and uses INS and Illuminet as its clearinghouses for casual calling and alternate service provider billing and collection arrangements. The Company contacted its billing vendor with respect to the FCC's Truth-in-Billing ("TIB") requirements in October, 1999. Since that time, the Company has had discussions with its billing vendor regarding TIB Rule compliance. Because of backlog and/or programming demands (including those arising from Year 2000 issues), the vendor has indicated that it is not capable of providing the necessary software updates required to comply with inquiry contact requirements at this time. TTB implementation is further complicated by the fact that the Company currently provides billing and collection services for casual calling and alternate service providers. The Company is not yet capable of listing inquiry contacts on bills for these providers. Accordingly, the Company requests that this requirement be extended to April 1, 2000, the date that certain other TIB rule requirements are to be effective. The Company will, however, engage in proper testing and will continue to work with its clearinghouses and software vendor to coordinate the resolution of this issue. Until the requested waiver expires, the Company will continue to provide its contact number to customers with questions concerning charges of particular carriers, and will facilitate the customer's effort to contact such carriers.

DECLARATION OF WELDON R. GRAY, CPA

I, Weldon R. Gray, Chief Financial Officer of Eastex Telephone Cooperative, Inc. ("Eastex"), do hereby declare under penalties of perjury that I have read the foregoing "Petition for Temporary, Limited Waiver" and the information contained therein regarding Eastex is true and accurate to the best of my knowledge, information, and belief.

Date: 10 27/99

By:

Weldon R. Gray, CPA

Chief Financial Officer

FIVE AREA TELEPHONE COOPERATIVE

Five Area Telephone Cooperative (the "Company") provides exchange and exchange access services to approximately 1,474 lines in Texas. The Company is a member of the United States Telephone Association ("USTA") and is a rural telephone company under the Communications Act of 1934 as amended. The Company utilizes UDP for the provision of billing software and uses INS as its clearinghouse for casual calling and alternate service provider billing and collection arrangements. The Company contacted its billing vendor with respect to the FCC's Truth-in-Billing ("TIB") requirements in July, 1999. Since that time, the Company has had discussions with its billing vendor regarding TIB Rule compliance. Because of backlog and/or programming demands (including those arising from Year 2000 issues), the vendor has indicated that it is not capable of providing the necessary software updates required to comply with inquiry contact requirements at this time. TIB implementation is further complicated by the fact that the Company currently provides billing and collection services for casual calling and alternate service providers. The Company is not yet capable of listing inquiry contacts on bills for these providers. Accordingly, the Company requests that this requirement be extended to April 1, 2000, the date that certain other TIB rule requirements are to be effective. The Company will, however, engage in proper testing and will continue to work with its clearinghouse and software vendor to coordinate the resolution of this issue. Until the requested waiver expires, the Company will continue to provide its contact number to customers with questions concerning charges of particular carriers, and will facilitate the customer's effort to contact such carriers.

DECLARATION OF JACQUE BOUTELL

I, Jacque Boutell, Office Manager of Five Area Telephone Cooperative ("Five Area"), do hereby declare under penalties of perjury that I have read the foregoing "Petition for Temporary, Limited Waiver" and the information contained therein regarding Five Area is true and accurate to the best of my knowledge, information, and belief.

Date: 10/27/99

Yoran Boutell
que Boutell

Office Manager

GEORGETOWN TELEPHONE COMPANY

Georgetown Telephone Company (the "Company") provides exchange and exchange access services to approximately 350 lines in Mississippi. The Company is a member of the United States Telephone Association ("USTA") and is a rural telephone company under the Communications Act of 1934 as amended. The Company utilizes CDG for the provision of billing software and uses Independent NECA Services as its clearinghouse for casual calling and alternate service provider billing and collection arrangements. The Company contacted its billing vendor with respect to the FCC's Truth-in-Billing ("TIB") requirements in May, 1999. Since that time, the Company has had discussions with its billing vendor regarding TIB Rule compliance. Because of backlog and/or programming demands (including those arising from Year 2000 issues), the vendor has indicated that it is not capable of providing the necessary software updates required to comply with inquiry contact requirements at this time. TIB implementation is further complicated by the fact that the Company currently provides billing and collection services for casual calling and alternate service providers. The Company is not yet capable of listing inquiry contacts on bills for these providers. Accordingly, the Company requests that this requirement be extended to April 1, 2000, the date that certain other TIB rule requirements are to be effective. The Company will, however, engage in proper testing and will continue to work with its clearinghouse and software vendor to coordinate the resolution of this issue. Until the requested waiver expires, the Company will continue to provide its contact number to customers with questions concerning charges of particular carriers, and will facilitate the customer's effort to contact such carriers.

DECLARATION OF JOIE MILLER

I, Joie Miller, Vice President/General Manager of Georgetown Telephone Company ("Georgetown"), do hereby declare under penalties of perjury that I have read the foregoing "Petition for Temporary, Limited Waiver" and the information contained therein regarding Georgetown is true and accurate to the best of my knowledge, information, and belief.

Date 10-22-99

Vice President/General Manager

GERMANTOWN TELEPHONE CO.

Germantown Telephone Co. (the "Company") provides exchange and exchange access services to approximately 2,650 lines in New York. The Company is a member of the United States Telephone Association ("USTA") and is a rural telephone company under the Communications Act of 1934 as amended. The Company utilizes APTIS for the provision of billing software and uses Illuminer as its clearinghouse for casual calling and alternate service provider billing and collection arrangements. The Company contacted its billing vendor with respect to the FCC's Truth-in-Billing ("TIB") requirements in May, 1999. Since that time, the Company has had discussions with its billing vendor regarding TIB Rule compliance. Because of backlog and/or programming demands (including those arising from Year 2000 issues), the vendor has indicated that it is not capable of providing the necessary software updates required to comply with inquiry contact requirements at this time. TIB implementation is further complicated by the fact that the Company currently provides billing and collection services for casual calling and alternate service providers. The Company is not yet capable of listing inquiry contacts on bills for these providers. Accordingly, the Company requests that this requirement be extended to April 1, 2000, the date that certain other TIB rule requirements are to be effective. The Company will, however, engage in proper testing and will continue to work with its clearinghouse and software vendor to coordinate the resolution of this issue. Until the requested waiver expires, the Company will continue to provide its contact number to customers with questions concerning charges of particular carriers, and will facilitate the customer's effort to contact such carriers.

DECLARATION OF BRUCE BOHNSACK

I, Bruce Bohnsack, President of Germantown Telephone Co. ("Germantown"), do hereby declare under penalties of perjury that I have read the foregoing "Petition for Temporary, Limited Waiver" and the information contained therein regarding Germantown is true and accurate to the best of my knowledge, information, and belief.

Date 10/21/99

Bruce Bohnsack

President

HOME TELEPHONE COMPANY

Home Telephone Company (the "Company") provides exchange and exchange access services to approximately 19,807 lines in South Carolina. The Company is a member of the United States Telecom Association ("USTA") and is a rural telephone company under the Communications Act of 1934 as amended. The Company utilizes Associated Data Services ("ADS") for the provision of billing software and uses Illuminet as its clearinghouse for casual calling and alternate service provider billing and collection arrangements. The Company contacted its billing vendor with respect to the FCC's Truth-in-Billing ("TIB") requirements in May, 1999. Since that time, the Company has had discussions with its billing vendor regarding TIB Rule compliance. Because of backlog and/or programming demands (including those arising from Year 2000 issues), the vendor has indicated that it is not capable of providing the necessary software updates required to comply with inquiry contact requirements at this time. TIB implementation is further complicated by the fact that the Company currently provides billing and collection services for casual calling and alternate service providers. The Company is not yet capable of listing inquiry contacts on bills for these providers. Accordingly, the Company requests that this requirement be extended to April 1, 2000, the date that certain other TIB rule requirements are to be effective. The Company will, however, engage in proper testing and will continue to work with its clearinghouse and software vendor to coordinate the resolution of this issue. Until the requested waiver expires, the Company will continue to provide its contact number to customers with questions concerning charges of particular carriers, and will facilitate the customer's effort to contact such carriers.

DECLARATION OF H. KEITH OLIVER

I, H. Keith Oliver, Vice President, Accounting and Finance of Home Telephone Company ("Home"), do hereby declare under penalties of perjury that I have read the foregoing "Petition for Temporary, Limited Waiver" and the information contained therein regarding Home is true and accurate to the best of my knowledge, information, and belief.

Date volation

H. Keith Oliver

Vice President, Accounting and Finance

LIVINGSTON TELEPHONE COMPANY

Livingston Telephone Company (the "Company") provides exchange and exchange access services to approximately 7,058 lines in Texas. The Company is a member of the United States Telephone Association ("USTA") and is a rural telephone company under the Communications Act of 1934 as amended. The Company utilizes Quintrex Data Systems for the provision of billing software and uses INS as its clearinghouse for casual calling and alternate service provider billing and collection arrangements. The Company contacted its billing vendor with respect to the FCC's Truth-in-Billing ("TIB") requirements in May. 1999. Since that time, the Company has had discussions with its billing vendor regarding TIB Rule compliance. Because of backlog and/or programming demands (including those arising from Year 2000 issues), the vendor has indicated that it is not capable of providing the necessary software updates required to comply with inquiry contact requirements at this time. TIB implementation is further complicated by the fact that the Company currently provides billing and collection services for casual calling and alternate service providers. The Company is not yet capable of listing inquiry contacts on bills for these providers. Accordingly, the Company requests that this requirement be extended to April 1, 2000, the date that certain other TIB rule requirements are to be effective. The Company will, however, engage in proper testing and will continue to work with its clearinghouse and software vendor to coordinate the resolution of this issue. Until the requested waiver expires, the Company will continue to provide its contact number to customers with questions concerning charges of particular carriers, and will facilitate the customer's effort to contact such carriers.

DECLARATION OF CURT WALZEL

I, Curt Walzel, General Manager of Livingston Telephone Company ("Livingston"), do hereby declare under penalties of perjury that I have read the foregoing "Petition for Temporary, Limited Waiver" and the information contained therein regarding Livingston is true and accurate to the best of my knowledge, information, and belief.

Date: 10-27-99

Curt Walzel

General Mahager

MUENSTER TELEPHONE CORPORATION OF TEXAS

Muenster Telephone Corporation of Texas (the "Company") provides exchange and exchange access services to approximately 3,650 lines in Texas. The Company is a member of the United States Telephone Association ("USTA") and is a rural telephone company under the Communications Act of 1934 as amended. The Company utilizes UDP for the provision of billing software and uses INS and Illuminet as its clearinghouses for casual calling and alternate service provider billing and collection arrangements. The Company contacted its billing vendor with respect to the FCC's Truth-in-Billing ("TIB") requirements in September, 1999. Since that time, the Company has had discussions with its billing vendor regarding TIB Rule compliance. Because of backlog and/or programming demands (including those arising from Year 2000 issues), the vendor has indicated that it is not capable of providing the necessary software updates required to comply with inquiry contact requirements at this time. TIB implementation is further complicated by the fact that the Company currently provides billing and collection services for casual calling and alternate service providers. The Company is not yet capable of listing inquiry contacts on bills for these providers. Accordingly, the Company requests that this requirement be extended to April 1, 2000, the date that certain other TIB rule requirements are to be effective. The Company will, however, engage in proper testing and will continue to work with its clearinghouses and software vendor to coordinate the resolution of this issue. Until the requested waiver expires, the Company will continue to provide its contact number to customers with questions concerning charges of particular carriers, and will facilitate the customer's effort to contact such carriers.

DECLARATION OF ALAN ROHMER

I. Alan Rohmer, Controller of Muenster Telephone Corporation of Texas ("Muenster"), do hereby declare under penalties of perjury that I have read the foregoing "Petition for Temporary, Limited Waiver" and the information contained therein regarding Muenster is true and accurate to the best of my knowledge, information, and belief.

Date: 10-27-99

By:

Alan Rohmer

Controller

NEW PARIS TELEPHONE. INC.

New Paris Telephone, Inc. (the "Company") provides exchange and exchange access services to approximately 2,150 lines in Indiana. The Company is a member of the United States Telephone Association ("USTA") and is a rural telephone company under the Communications Act of 1934 as amended. The Company utilizes Martin & Associates for the provision of billing software and uses Independent NECA Services as its clearinghouse for casual calling and alternate service provider billing and collection arrangements. The Company contacted its billing vendor with respect to the FCC's Truth-in-Billing ("TIB") requirements in May, 1999. Since that time, the Company has had discussions with its billing vendor regarding TIB Rule compliance. Because of backlog and/or programming demands (including those arising from Year 2000 issues), the vendor has indicated that it is not capable of providing the necessary software updates required to comply with inquiry contact requirements at this time. TIB implementation is further complicated by the fact that the Company currently provides billing and collection services for casual calling and alternate service providers. The Company is not yet capable of listing inquiry contacts on bills for these providers. Accordingly, the Company requests that this requirement be extended to April 1, 2000, the date that certain other TIB rule requirements are to be effective. The Company will, however, engage in proper testing and will continue to work with its clearinghouse and software vendor to coordinate the resolution of this issue. Until the requested waiver expires, the Company will continue to provide its contact number to customers with questions concerning charges of particular carriers, and will facilitate the customer's effort to contact such carriers.

DECLARATION OF MARK GRADY

I, Mark Grady, General Manager of New Paris Telephone, Inc. ("New Paris"), do hereby declare under penalties of perjury that I have read the foregoing "Petition for Temporary, Limited Waiver" and the information contained therein regarding New Paris is true and accurate to the best of my knowledge, information, and belief.

Date $\frac{/v}{27/99}$

General Manager

NORTEX TELCOM, L.L.C.

Nortex Telcom, L.L.C. (the "Company") provides exchange and exchange access services to approximately 130 lines in Texas. The Company utilizes UDP for the provision of billing software and uses INS and Illuminet as its clearinghouses for casual calling and alternate service provider billing and collection arrangements. The Company contacted its billing vendor with respect to the FCC's Truth-in-Billing ("TIB") requirements in September, 1999. Since that time, the Company has had discussions with its billing vendor regarding TIB Rule compliance. Because of backlog and/or programming demands (including those arising from Year 2000 issues), the vendor has indicated that it is not capable of providing the necessary software updates required to comply with inquiry contact requirements at this time. TIB implementation is further complicated by the fact that the Company currently provides billing and collection services for casual calling and alternate service providers. The Company is not yet capable of listing inquiry contacts on bills for these providers. Accordingly, the Company requests that this requirement be extended to April 1, 2000, the date that certain other TIB rule requirements are to be effective. The Company will, however, engage in proper testing and will continue to work with its clearinghouses and software vendor to coordinate the resolution of this issue. Until the requested waiver expires, the Company will continue to provide its contact number to customers with questions concerning charges of particular carriers, and will facilitate the customer's effort to contact such carriers.

DECLARATION OF ALAN ROHMER

I, Alan Rohmer, Controller of Nortex Telcom, L.L.C. ("Nortex"), do hereby declare under penalties of perjury that I have read the foregoing "Petition for Temporary, Limited Waiver" and the information contained therein regarding Nortex is true and accurate to the best of my knowledge, information, and belief.

Date: 10-26-99

By: <u>Alan Rohmer</u>

Controller

NORTH PITTSBURGH TELEPHONE COMPANY

North Pittsburgh Telephone Company (the "Company") provides exchange and exchange access services to approximately 73,000 lines in Pennsylvania. The Company is a member of the United States Telephone Association ("USTA") and is a rural telephone company under the Communications Act of 1934 as amended. The Company utilizes Armstrong and Billing Concepts for the provision of billing software and uses Independent NECA Services and Illuminet as its clearinghouses for casual calling and alternate service provider billing and collection arrangements. The Company contacted its billing vendor with respect to the FCC's Truth-in-Billing ("TIB") requirements in May, 1999. Since that time, the Company has had discussions with its billing vendor regarding TIB Rule compliance. Because of backlog and/or programming demands (including those arising from Year 2000 issues), the vendor has indicated that it is not capable of providing the necessary software updates required to comply with inquiry contact requirements at this time. TIB implementation is further complicated by the fact that the Company currently provides billing and collection services for casual calling and alternate service providers. The Company is not yet capable of listing inquiry contacts on bills for these providers. Accordingly, the Company requests that this requirement be extended to April 1, 2000, the date that certain other TIB rule requirements are to be effective. The Company will, however, engage in proper testing and will continue to work with its clearinghouses and software vendor to coordinate the resolution of this issue. Until the requested waiver expires, the Company will continue to provide its contact number to customers with questions concerning charges of particular carriers, and will facilitate the customer's effort to contact such carriers.

DECLARATION OF KEVIN J. ALBAUGH

I, Kevin J. Albaugh, Vice President of Regulatory Affairs for North Pittsburgh Telephone Company ("North Pittsburgh"), do hereby declare under penalties of perjury that I have read the foregoing "Petition for Temporary, Limited Waiver" and the information contained therein regarding North Pittsburgh is true and accurate to the best of my knowledge, information, and belief.

Date October 25, 1999

Kevin J. Albaugh

Vice President, Regulatory Affairs

RIVIERA TELEPHONE COMPANY

Riviera Telephone Company (the "Company") provides exchange and exchange access services to approximately 1,131 lines in Texas. The Company is a member of the United States Telephone Association ("USTA") and is a rural telephone company under the Communications Act of 1934 as amended. The Company utilizes Aptis, a subsidiary of Billing Concepts, for the provision of billing software and uses INS and Illuminet as its clearinghouses for casual calling and alternate service provider billing and collection arrangements. The Company contacted its billing vendor with respect to the FCC's Truth-In-Billing ("TIB") requirements on September 7, 1999. Since that time, the Company has had discussions with its billing vendor regarding TIB Rule compliance. Because of backlog and/or programming demands (including those arising from Year 2000 issues), the vendor has indicated that it is not capable of providing the necessary software updates required to comply with inquiry contact requirements at this time. TIB implementation is further complicated by the fact that the Company currently provides billing and collection services for casual calling and alternate service providers. The Company is not yet capable of listing inquiry contacts on bills for these providers. Accordingly, the Company requests that this requirement be extended to April 1, 2000, the date that certain other TIB rule requirements are to be effective. The Company will, however, engage in proper testing and will continue to work with its clearinghouses and software vendor to coordinate the resolution of this issue. Until the requested waiver expires, the Company will continue to provide its contact number to customers with questions concerning charges of particular carriers, and will facilitate the customer's effort to contact such carriers.

DECLARATION OF BILL COLSTON, JR.

I, Bill Colston, Jr., General Manager of Riviera Telephone Company ("Riviera"), do hereby declare under penalties of perjury that I have read the foregoing "Petition for Temporary, Limited Waiver" and the information contained therein regarding Riviera is true and accurate to the best of my knowledge, information, and belief.

Date: 10/27/49

ly: (<u>511</u>

General Manager

SANTA ROSA TELEPHONE COOPERATIVE, INC.

Santa Rosa Telephone Cooperative, Inc. (the "Company") provides exchange and exchange access services to approximately 2,374 lines in Texas. The Company is a rural telephone company under the Communications Act of 1934 as amended. The Company utilizes UDP for the provision of billing software and uses INS as its clearinghouse for casual calling and alternate service provider billing and collection arrangements. The Company contacted its billing vender with respect to the FCC's Truth-in-Billing ("TIB") requirements in September, 1999. Since that time, the Company has had discussions with its billing vendor regarding TIB Rule compliance. Because of backlog and/or programming demands (including those arising from Year 2000 issues), the vendor has indicated that it is not capable of providing the necessary software updates required to comply with inquiry contact requirements at this time. TIB implementation is further complicated by the fact that the Company currently provides billing and collection services for casual calling and alternate service providers. The Company is not yet capable of listing inquiry contacts on bills for these providers. Accordingly, the Company request that this requirement be extended to April 1, 2000, the date that certain other TIB rule requirements are to be effective. The Company will, however, engage in proper testing and will continue to work with its clearinghouse and software vendor to coordinate the resolution of this issue. Until the requested waiver expires, the Company will continue to provide its contact number to customers with questions concerning charges of particular carriers, and will facilitate the customer's effort to contact such carriers.

DECLARATION OF DENNIS RAINES

I, Dennis Raines, General Manager of Santa Rosa Telephone Cooperative ("Santa Rosa"), do hereby declare under penalties of perjury that I have read the foregoing "Petition for Temporary, Limited Waiver" and the information contained therein regarding Santa Rosa is true and accurate to the best of my knowledge, information, and belief.

Date: October 26, 1999

Dennis Raines General Manager



South Central Rural Telephone

Cooperative Corporation, Inc. =

South Central Rural Telephone Cooperative Corp., Inc. (the "Company") provides exchange and exchange access services to approximately 27,000 lines in Kentucky. The Company is a member of the United States Telephone Association ("USTA") and is a rural telephone company under the Communications Act of 1934 as amended. The Company utilizes in-house resources for the provision of billing software and uses Independent NECA Services as its clearinghouse for casual calling and alternate service provider billing and collection arrangements. The Company reviewed its billing software capabilities with respect to the FCC's Truth-in-Billing ("TIB") requirements in May, 1999. Since that time, the Company has continued its review and discussions with its billing staff regarding TIB Rule compliance. Because of backlog and/or programming demands (including those arising from Year 2000 issues), the Company is not capable of providing the necessary software updates required to comply with inquiry contact requirements at this time. TIB implementation is further complicated by the fact that the Company currently provides billing and collection services for casual calling and alternate service providers. The Company is not yet capable of listing inquiry contacts on bills for these providers. Accordingly, the Company requests that this requirement be extended to April 1, 2000, the date that certain other TIB rule requirements are to be effective. The Company will, however, engage in proper testing and will continue to work with its clearinghouse and billing staff to coordinate the resolution of this issue. Until the requested waiver expires, the Company will continue to provide its contact number to customers with questions concerning charges of particular carriers, and will facilitate the customer's effort to contact such carriers.

DECLARATION OF DARYL WYATT

I, Daryl Wyatt, General Manager for South Central Rural Telephone Cooperative Corp., Inc. ("SCRTC"), do hereby declare under penalties of perjury that I have read the foregoing "Petition for Temporary, Limited Waiver" and the information contained therein regarding SCRTC is true and accurate to the best of my knowledge, information, and belief.

Date 10/22/09

General Manager

Daryl Wyatt

SOUTH PLAINS TELEPHONE COOPERATIVE

South Plains Telephone Cooperative (the "Company") provides exchange and exchange access services to approximately 5,208 lines in Texas. The Company is a rural telephone company under the Communications Act of 1934 as amended. The Company utilizes Quintrex Data Systems for the provision of billing software and uses INS and Illuminet as its clearinghouses for casual calling and alternate service provider billing and collection arrangements. The Company contacted its billing vendor with respect to the FCC's Truth-in-Billing ("TIB") requirements in September, 1999. Since that time, the Company has had discussions with its billing vendor regarding TIB Rule compliance. Because of backlog and/or programming demands (including those arising from Year 2000 issues), the vendor has indicated that it is not capable of providing the necessary software updates required to comply with inquiry contact requirements at this time. TIB implementation is further complicated by the fact that the Company currently provides billing and collection services for casual calling and alternate service providers. The Company is not yet capable of listing inquiry contacts on bills for these providers. Accordingly, the Company requests that this requirement be extended to April 1, 2000, the date that certain other TIB rule requirements are to be effective. The Company will, however, engage in proper testing and will continue to work with its clearinghouses and software vendor to coordinate the resolution of this issue. Until the requested waiver expires, the Company will continue to provide its contact number to customers with questions concerning charges of particular carriers, and will facilitate the customer's effort to contact such carriers.

DECLARATION OF SCOTT HART

I, Scott Hart, General Manager of South Plains Telephone Cooperative ("South Plains"), do hereby declare under penalties of perjury that I have read the foregoing "Petition for Temporary, Limited Waiver" and the information contained therein regarding South Plains is true and accurate to the best of my knowledge, information, and belief.

Date: 10-25-99

Bv:

Scott Hart General Manager

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Southwest Arkansas Telephone Coop., Inc. (the "Company") provides exchange and exchange access services to approximately 6,057 lines in Arkansas and Texas. The Company is a rural telephone company under the Communications Act of 1934 as amended. The Company utilizes Quintrex Data Systems for the provision of billing software and uses Illuminet as its clearinghouse for casual calling and alternate service provider billing and collection arrangements. The Company contacted its billing vendor with respect to the FCC's Truth-in-Billing ("TIB") requirements in September, 1999. Since that time, the Company has had discussions with its billing vendor regarding TIB Rule compliance. Because of backlog and/or programming demands (including those arising from Year 2000 issues), the vendor has indicated that it is not capable of providing the necessary software updates required to comply with inquiry contact requirements at this time. TIB implementation is further complicated by the fact that the Company currently provides billing and collection services for casual calling and alternate service providers. The Company is not yet capable of listing inquiry contacts on bills for these providers. Accordingly, the Company requests that this requirement be extended to April 1, 2000, the date that certain other TIB rule requirements are to be effective. The Company will, however, engage in proper testing and will continue to work with its clearinghouse and software vendor to coordinate the resolution of this issue. Until the requested waiver expires, the Company will continue to provide its contact number to customers with questions concerning charges of particular carriers, and will facilitate the customer's effort to contact such carriers.

DECLARATION OF WILLIAM P. HEGMANN

I, William P. Hegmann, General Manager of Southwest Arkansas Telephone Coop., Inc. ("Southwest Arkansas"), do hereby declare under penalties of perjury that I have read the foregoing "Petition for Temporary, Limited Waiver" and the information contained therein regarding Southwest Arkansas is true and accurate to the best of my knowledge, information, and belief.

Date: 10/27/99

William P. Hegmann General Manager

WEST KENTUCKY RURAL TELEPHONE COOPERATIVE

West Kentucky Rural Telephone Cooperative (the "Company") provides exchange and exchange access services to approximately 18,000 lines in Kentucky and Tennessee. The Company is a rural telephone company under the Communications Act of 1934 as amended. The Company utilizes in-house resources for the provision of billing software and uses Independent NECA Services as its clearinghouse for casual calling and alternate service provider billing and collection arrangements. The Company reviewed its billing software capabilities with respect to the FCC's Truth-in-Billing ("TIB") requirements in May. 1999. Since that time, the Company has continued its review and discussions with its billing staff regarding TIB Rule compliance. Because of backlog and/or programming demands (including those arising from Year 2000 issues), the Company is not capable of providing the necessary software updates required to comply with inquiry contact requirements at this time. implementation is further complicated by the fact that the Company currently provides billing and collection services for casual calling and alternate service providers. The Company is not yet capable of listing inquiry contacts on bills for these providers. Accordingly, the Company requests that this requirement be extended to April 1, 2000, the date that certain other TIB rule requirements are to be effective. The Company will, however, engage in proper testing and will continue to work with its clearinghouse and billing staff to coordinate the resolution of this issue. Until the requested waiver expires, the Company will continue to provide its contact number to customers with questions concerning charges of particular carriers, and will facilitate the customer's effort to contact such carriers.

DECLARATION OF TREVOR BONNSTETTER

I, Trevor Bonnstetter, General Manager for West Kentucky Rural Telephone Cooperative ("West Kentucky"), do hereby declare under penalties of perjury that I have read the foregoing "Petition for Temporary, Limited Waiver" and the information contained therein regarding West Kentucky is true and accurate to the best of my knowledge, information, and belief.

Date 16-27.99

Trevor Bonnstetter General Manager

WEST PLAINS TELECOMMUNICATIONS

West Plains Telecommunications (the "Company") provides exchange and exchange access services to approximately 5,837 lines in Texas. The Company is a rural telephone company under the Communications Act of 1934 as amended. The Company utilizes UDP for the provision of billing software and uses INS as its clearinghouse for casual calling and alternate service provider billing and collection arrangements. The Company contacted its billing vendor with respect to the FCC's Truth-in-Billing ("TIB") requirements in July, 1999. Since that time, the Company has had discussions with its billing vendor regarding TIB Rule compliance. Because of backlog and/or programming demands (including those arising from Year 2000 issues), the vendor has indicated that it is not capable of providing the necessary software updates required to comply with inquiry contact requirements at this time. TIB implementation is further complicated by the fact that the Company currently provides billing and collection services for casual calling and alternate service providers. The Company is not yet capable of listing inquiry contacts on bills for these providers. Accordingly, the Company requests that this requirement be extended to April 1, 2000, the date that certain other TIB rule requirements are to be effective. The Company will, however, engage in proper testing and will continue to work with its clearinghouse and software vendor to coordinate the resolution of this issue. Until the requested waiver expires, the Company will continue to provide its contact number to customers with questions concerning charges of particular carriers, and will facilitate the customer's effort to contact such carriers.

DECLARATION OF JACQUE BOUTELL

I, Jacque Boutell, Office Manager of West Plains Telecommunications ("West Plains"), do hereby declare under penalties of perjury that I have read the foregoing "Petition for Temporary, Limited Waiver" and the information contained therein regarding West Plains is true and accurate to the best of my knowledge, information, and belief.

Date: 10/25/99

Bv:

Jacque Boutell
Office Manager

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WEST POINT TELEPHONE COMPANY, INC.

West Point Telephone Company. Inc. (the "Company") provides exchange and exchange access services to approximately 725 lines in Indiana. The Company is a niral telephone company under the Communications Act of 1934 as amended. The Company utilizes Communications Data Group for the provision of billing software and uses Independent NECA Services ("INS") as its clearinghouse for casual calling and alternate service provider billing and collection arrangements. The Company contacted its billing vendor with respect to the FCC's Truth-in-Billing ("TIB") requirements in May, 1999. Since that time, the Company has had discussions with its billing vendor regarding TIB Rule compliance. Because of backlog and/or programming demands (including those arising from Year 2000 issues), the vendor has indicated that it is not capable of providing the necessary software updates required to comply with inquiry contact requirements at this time. TIB implementation is further complicated by the fact that the Company currently provides billing and collection services for casual calling and alternate service providers. The Company is not yet capable of listing inquiry contacts on bills for these providers. Accordingly, the Company requests that this requirement be extended to April 1, 2000, the date that certain other TIB rule requirements are to be effective. The Company will, however, engage in proper testing and will continue to work with its clearinghouse and software vendor to coordinate the resolution of this issue. Until the requested waiver expires, the Company will continue to provide its contact number to customers with questions concerning charges of particular carriers, and will facilitate the customer's effort to contact such carriers.

DECLARATION OF GARY L. CHEESMAN

1, Gary L. Cheesman, President and General Manager, of West Point Telephone Company. Inc. ("West Point"), do hereby declare under penalties of perjury that I have read the foregoing "Petition for Temporary, Limited Waiver" and the information contained therein regarding West Point is true and accurate to the best of my knowledge, information, and belief.

Date 10-27-99

Gary L. Cheesman

President and General Manager

WEST TEXAS TELEPHONE COOPERATIVE, INC.

West Texas Telephone Cooperative, Inc. (the "Company") provides exchange and exchange access services to approximately 2,000 lines in Texas. The Company is a member of the United States Telephone Association ("USTA") and is a rural telephone company under the Communications Act of 1934 as amended. The Company utilizes Quintrex for the provision of billing software and uses Illuminer and Independent NECA Services as its clearinghouse for casual calling and alternate service provider billing and collection arrangements. The Company contacted its billing vendor with respect to the FCC's Truth-in-Billing ("TIB") requirements in May, 1999. Since that time, the Company has had discussions with its billing vendor regarding TIB Rule compliance. Because of backlog and/or programming demands (including those arising from Year 2000 issues), the vendor has indicated that it is not capable of providing the necessary software undates required to comply with inquiry contact requirements at this time. TIB implementation is further complicated by the fact that the Company currently provides billing and collection services for casual calling and alternate service providers. The Company is not yet capable of listing inquiry contacts on bills for these providers. Accordingly, the Company requests that this requirement be extended to April 1, 2000, the date that certain other TIB rule requirements are to be effective. The Company will, however, engage in proper testing and will continue to work with its clearinghouse and software vendor to coordinate the resolution of this issue. Until the requested waiver expires, the Company will continue to provide its contact number to customers with questions concerning charges of particular carriers, and will facilitate the customer's effort to contact such carriers.

DECLARATION OF JIMMY D. BELL

I, Jimmy D. Bell, Assistant Manager for West Texas Telephone Cooperative, Inc. ("West Texas"), do hereby declare under penalties of perjury that I have read the foregoing "Petition for Temporary, Limited Waiver" and the information contained therein regarding West Texas is true and accurate to the best of my knowledge, information, and belief.

Date 10/22/98

Jimmy D. Bell O Assistant Manager

XIT RURAL TELEPHONE COOPERATIVE, INC.

XIT Rural Telephone Cooperative, Inc. (the "Company") provides exchange and exchange access services to approximately 1,402 lines in Texas. The Company is a member of the United States Telephone Association ("USTA") and is a rural telephone company under the Communications Act of 1934 as amended. The Company utilizes Global Systems for the provision of billing software and uses Illuminet as its clearinghouse for casual calling and alternate service provider billing and collection arrangements. The Company contacted its billing vendor with respect to the FCC's Truth-in-Billing ("TTB") requirements on September 10, 1999. Since that time, the Company has had discussions with its billing vendor regarding TIB Rule compliance. Because of backlog and/or programming demands (including those arising from Year 2000 issues), the vendor has indicated that it is not capable of providing the necessary software updates required to comply with inquiry contact requirements at this time. TIB implementation is further complicated by the fact that the Company currently provides billing and collection services for casual calling and alternate service providers. The Company is not yet capable of listing inquiry contacts on bills for these providers. Accordingly, the Company requests that this requirement be extended to April 1, 2000, the date that certain other TIB rule requirements are to be effective. The Company will, however, engage in proper testing and will continue to work with its clearinghouse and software vendor to coordinate the resolution of this issue. Until the requested waiver expires, the Company will continue to provide its contact number to customers with questions concerning charges of particular carriers, and will facilitate the customer's effort to contact such carriers.

DECLARATION OF DARRELL DENNIS

I, Darrell Dennis, Assistant Manager of XIT Rural Telephone Cooperative, Inc. ("XIT Rural"), do hereby declare under penalties of perjury that I have read the foregoing "Petition for Temporary, Limited Waiver" and the information contained therein regarding XIT Rural is true and accurate to the best of my knowledge, information, and belief.

Date: 10/27/99

By:

Danell 7 Wennin Darrell Dennis

Assistant Manager

XIT TELECOMMUNICATION AND TECHNOLOGY

XIT Telecommunication and Technology (the "Company") provides exchange and exchange access services to approximately 3,176 lines in Texas. The Company utilizes Global Systems for the provision of billing software and uses Illuminet as its clearinghouse for casual calling and alternate service provider billing and collection arrangements. The Company contacted its billing vendor with respect to the FCC's Truth-In-Billing ("TIB") requirements on 09/10 1999. Since that time, the Company has had discussions with its billing vendor regarding TIB Rule compliance. Because of backlog and/or programming demands (including those arising from Year 2000 issues), the vendor has indicated that it is not capable of providing the necessary software updates required to comply with inquiry contact requirements at this time. TIB implementation is further complicated by the fact that the Company currently provides billing and collection services for casual calling and alternative service providers. The Company is not yet capable of listing inquiry contacts on bills for these providers. Accordingly, the Company requests that this requirement be extended to April 1, 2000, the date that certain other TIB rule requirements are to be effective. The Company will, however, engage in proper testing and will continue to work with its clearinghouses and software vendor to coordinate the resolution of this issue. Until the requested waiver expires, the Company will continue to provide its contact number to customers with questions concerning charges of particular carriers, and will facilitate the customer's effort to contact such carriers.

DECLARATION OF DARRELL DENNIS.

I, Darrell Dennis, Assistant Manager of XIT Telecommunication and Technology ("XTT"), do hereby declare under penalties of perjury that I have read the foregoing "Petition for Temporary, Limited Waiver" and the information contained therein regarding XTT is true and accurate to the best of my knowledge, information, and belief.

Date: 10/27/99

By:

hanell F. Wennin Darrell Dennis

Assistant Manager

CERTIFICATE OF SERVICE

I, Jessica Robinson, of Kraskin, Lesse & Cosson, LLP, 2120 L Street, NW, Suite 520, Washington, DC 20037, hereby certify that a copy of the foregoing "Petition for Temporary, Limited Waiver" was served on this 27th day of October, 1999 by hand delivery to the following parties:

Jessica Robinson

Lawrence Strickling, Chief Common Carrier Bureau Federal Communications Commission 445 12th Street, SW Room 5-C450 Washington, DC 20554

Lisa Zaina, Acting Deputy Bureau Chief Common Carrier Bureau Federal Communications Commission 445 12th Street, SW, Room 5-B303 Washington, DC 20554

Glenn T. Reynolds, Chief Enforcement Division Common Carrier Bureau Federal Communications Commission 445 12th Street, SW, Room 5-A847 Washington, DC 20554

David Konuch, Attorney Common Carrier Bureau Federal Communications Commission 445 12th Street, SW, Room 5-C313 Washington, DC 20036

International Transcription Services 1231 20th Street, NW Washington, DC 20554